

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MADELEINE F. SHATTENKIRK, individually
and on behalf of all others similarly situated,

Plaintiff,

v.

ALASKA AIRLINES, INC., a Delaware
corporation,

Defendant.

No. C19-01656 RSL

**STIPULATION AND ORDER FOR
TEMPORARY STAY PENDING
NEGOTIATION OF POTENTIAL
GLOBAL CLASS ACTION
SETTLEMENT**

The parties, by and through their counsel, stipulate and agree as follows:

1. On October 16, 2019, Plaintiff filed this proposed class action suit, which is one of ten separately filed class actions around the country against various airlines and Amtrak involving the sale of trip insurance (the “Cases”).¹

¹ The nine other cases are: *Dolan v. JetBlue Airways Corp.*, No. 0:18-cv-62193-RS (S.D. Fla.); *Zamber v. American Airlines, Inc.*, No. 4:20-cv-00114 (N.D. Tex.); *Flores v. United Airlines*, No. 18-cv-06571 (N.D. Ill.); *Foshee v. Delta Air Lines, Inc.*, No. 4:19-cv-00612-MW-CAS (N.D. Fla.); *O’Kane v. JetBlue Airways Corp.*, No. 19-cv-09662 (S.D.N.Y.); *Donoff v. Delta Airlines, Inc.*, No. 9:18-cv-81258 (M.D. Fla.); *Vallarta v. United Airlines, Inc.*, 19-cv-05895-HSG (N.D. Cal.); *Durkee v. Alaska Airlines*, No. 19-cv-1071 (S.D. Cal.); and *Salmons v. Nat’l R.R. Passenger Corp. (Amtrak)*, No. 1:19-cv-03253 (D.D.C.).

2. The parties have fully briefed Defendant's motion to dismiss and motion to transfer under the first to file rule, and these motions are currently under submission;

3. As described in the Declaration of Rodney A. Max filed contemporaneously with this Motion, over the past few months there have been ongoing discussions about a potential global resolution of the Cases between counsel for the plaintiffs in the Cases and counsel for AGA Service Company d/b/a Allianz Global Assistance (“Allianz”).

4. Following five lengthy, hard-fought, and in person mediation sessions, including the most recent on March 12, 2020, Allianz's counsel and counsel for the plaintiffs in the Cases have reached agreement on a number of terms that do not yet form a binding agreement and continue to work diligently toward an agreement to resolve the Cases. *See* Declaration of Rodney A. Max.

5. The Parties, therefore, seek a stay to enable the Parties to work toward a potential global settlement.

6. The Parties agree to submit a joint report updating the Court on the status of the settlement negotiations within 30 days of an order staying this case.

IT IS SO STIPULATED.

DATED this 20th day of March, 2020.

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STIP. & ORDER FOR TEMPORARY STAY PENDING
NEGOTIATION OF POTENTIAL GLOBAL CLASS ACTION
SETTLEMENT- 2

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Attorneys for Defendant Alaska Airlines, Inc.

ORDER

Based on the foregoing Stipulation, the Court ORDERS that the action is stayed.

Within 30 days from the date of this Order, the parties shall submit a joint report updating the Court on the status of settlement.

IT IS SO ORDERED.

DATED this 20th day of March, 2020.



Robert S. Lasnik
United States District Judge

STIP. & ORDER FOR TEMPORARY STAY PENDING
NEGOTIATION OF POTENTIAL GLOBAL CLASS ACTION
SETTLEMENT- 4

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2 Presented by:

3 TOUSLEY BRAIN STEPHENS PLLC
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STIP. & ORDER FOR TEMPORARY STAY PENDING
NEGOTIATION OF POTENTIAL GLOBAL CLASS ACTION
SETTLEMENT- 5